

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MERCURY LUGGAGE  
MANUFACTURING COMPANY, a Florida corporation, Civ. Case No.: 3:19-cv-1939-M

Plaintiff,

v.

DOMAIN PROTECTION, LLC, a Texas  
limited liability company,

Defendant.

\_\_\_\_\_ /

**DECLARATION OF RICHARD RIVERA**

I, Richard D. Rivera, hereby declare under penalty of perjury in accordance with 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and am duly competent and qualified to make this Declaration from my personal knowledge. I could competently testify as to the contents of this Declaration if called as a witness in this matter.

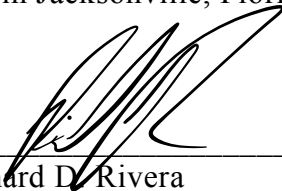
2. In preparing the Reply Brief of Mercury Luggage Manufacturing Co. (“Mercury Luggage”) in support of its application for fees in this matter, I performed the following work:

- a. August 18, 2021, 1.4 hours: Seward Trunk: Conduct review and analysis of opposition to fee application filed by opposing party (.4); conduct review and analysis of relevant authority concerning assertions made in opposition (.6); begin drafting reply brief in support of fee application (.4)

- b. August 27, 2021, 5.1 hours: Seward Trunk: Draft reply brief in support of application for fees to be awarded under Rule 37 (4.3); draft Rivera declaration in support of reply brief (.2); review and revise reply brief (.6)
3. Smith Gambrell & Russell usually charges \$340 per hour for my time. Mercury Luggage Manufacturing Co. and its parent company, Advantus, Corp. have regularly paid this rate for my time on matters in which I have represented them.
4. In performing these tasks, I spent 6.5 hours at a rate of \$340 per hour, for a total of \$2,210.00.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of August, 2021 in Jacksonville, Florida.

  
\_\_\_\_\_  
Richard D. Rivera